

Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

**Rodemacher Power Station
CLECO Power, L.L.C.
Boyce, Rapides Parish, Louisiana
Agency Interest Number: 2922
Activity Number: PER19960001
Draft Permit 2360-00030-V0 and 2360-00030-IV3**

I. APPLICANT:

Company:
CLECO Power, L.L.C.
2030 Donahue Ferry Road
Pineville, LA 71360

Facility:
Rodemacher Power Station

Approximate UTM coordinates are 526,804 kilometers East and 3,473,509 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS:

Rodemacher Power Station is a fossil-fuel fired steam/electric generation facility partially owned and operated by CLECO Power, LLC. The Rodemacher Power Station currently operates under Permit No. 431, issued April 8, 1975. Rodemacher Power Station is also operating under Acid Rain Permit No. 2360-00030-IV2. The Rodemacher Power Station is contiguous to Rodemacher Unit 3 facility operating under Title V operating permit 2927-V0 and Acid Rain Permit 2927-IV0.

This is the initial Part 70 operating permit for the Rodemacher Power Station.

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III. PROPOSED PERMIT / PROJECT INFORMATION:

Proposed Permit

A permit application and Emission Inventory Questionnaire were submitted by CLECO Corporation on October 9, 1996 requesting a Part 70 operating permit. Additional information dated June 17, 2003 was also received. On June 6, 2005 a revised application was submitted to replace the original application and the June 17th addendum. Additional information was submitted on December 6, 2005 and on April 6, 2006.

Project Description

The Rodemacher Power Station operates two electric utility units. Additional emission sources at the site include a package boiler, the material handling operations for the transfer and storage of coal (i.e. unloading, conveyors, transfer houses, storage piles, etc.), and the storage of volatile organic liquids.

Unit 1 and Unit 2 each consist of a fossil-fuel-fired boiler and the steam turbine. The fuel sources for Unit 1 include natural gas, used fuel oil, No. 2 fuel oil, and No. 6 fuel oil. The fuel source options for unit 2 include coal in addition to natural gas and No. 6 fuel oil. Each unit utilizes a boiler to convert the fossil fuel into steam; the steam powers the associated turbine, which in turn produces electricity. The Package Boiler is utilized to heat No. 6 fuel oil to aide in its handling and processing.

Emissions are generated from Unit 1, Unit 2, and the Package Boiler through the combustion of the fossil fuel source. Although different fuels may be utilized, each combustion source produces emissions of criteria pollutants, including particulate matter less than 10 microns (PM_{10}), sulfur dioxide (SO_2), nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC).

Material handling sources include conveyors, crusher house, drop points (rail car unloading, hoppers, transfer houses and storage piles), silos, storage piles, transfer bay, transfer houses, truck loading, and materials moving on unpaved roads. Coal is delivered to the RPS by rail cars, unloaded to a receiving hopper, and then conveyed through three enclosed transfer houses to the crusher house. In the crusher house, the coal is processed through crushers to allow the material to be more easily fed to the boiler of Unit 2. After the crusher house, the coal is conveyed to storage piles from where the material is fed directly to the boiler's combustion chamber. The ash generated from the combustion process is collected in silos prior to loading through a closed-vent system into trucks for transfer.

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Tanks are utilized to store various organic liquids at the Rodemacher Power Station including No. 2 fuel oil; No. 6 fuel oil; used oil; diesel; and condensate. Emissions of volatile organic compounds mainly result from the breathing and working losses from the storage tanks induced by variations in liquid levels and atmospheric conditions. Loading loss emissions are negligible as most of the materials handled have very low vapor pressures.

The Startup/Shutdown emissions for the Boilers were evaluated. The emissions during startup/shutdown will remain lower than standard operation, therefore to be conservative Rodemacher is calculating the emissions using standard operation at 8760 hours per year.

Effects on Ambient Air

Emissions from the Rodemacher Power Station do not adversely impact the ambient air quality, as demonstrated through compliance with the Primary and Secondary National Ambient Air Quality Standards (NAAQS). Rapides has been identified by the LDEQ as being in attainment with all NAAQS through continued ambient air monitoring operations, which demonstrates that the continued operation of the Rodemacher Power Station since the mid-1970s has not adversely impacted the ambient air quality of the surrounding area.

Dispersion Model Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard
PM ₁₀	Annual	26.20 µg/m ³	50 µg/m ³
	24-hour	124.4 µg/m ³	150 µg/m ³
SO ₂	24-hour	256.0 µg/m ³	365 µg/m ³
	3-hour	728.9 µg/m ³	1300 µg/m ³
Ozone	8-hour	148.21 µg/m ³	157 µg/m ³
NO _x *	Annual	2.74 µg/m ³	100 µg/m ³

*ISCST3 (screen)

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Permitted Air Emissions

The estimated permitted emissions from the new facility in tons per calendar year are as follows:

Pollutant	Emissions for Rodemacher Power Station	Emissions for Rodemacher Unit 3	Total Emissions
PM ₁₀	3310.12	327.05	3637.17
SO ₂	43,360.10	3,744.68	47,104.78
NO _x	18,165.10	1,747.32	19,912.42
CO	3,501.80	2,498.78	6,000.58
VOC	277.45	117.44	394.89

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Emissions for Rodemacher Power Station	Emissions for Rodemacher Unit 3	Total Emissions
2,4-Dinitrotoluene	<0.001	<0.001	<0.001
2-Chloroacetophenone	0.010	0.006	0.016
2-Methylnaphthalene	0.002	-	0.002
Acetaldehyde	0.932	0.418	1.35
Acetophenone	0.021	0.010	0.031
Acrolein	0.407	0.214	0.621
Benzene	1.862	0.956	2.818
Benzyl Chloride	0.982	0.516	1.498
Biphenyl	0.002	0.003	0.005
Bis(2-ethylhexyl)phthalate	0.391	0.054	0.445
Bromoform	0.055	0.028	0.083
Carbon Disulfide	0.182	0.094	0.276
Chlorobenzene	0.031	0.016	0.047
Chloroform	0.083	0.044	0.127
Cumene	0.007	0.004	0.011
Dichlorobenzene	0.050	<0.001	0.05
Dimethyl Sulfate	0.067	0.036	0.103
Ethyl Benzene	0.141	0.068	0.209
Ethyl Chloride	0.059	0.030	0.089

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Ethylene Dibromide	0.002	<0.001	0.002
Ethylene Dichloride	0.056	0.030	0.086
Formaldehyde	10.017	0.178	10.195
Hexane	74.967	0.048	75.015
Isophorone	0.813	0.426	1.239
Methyl Bromide	0.224	0.116	0.34
Methyl Chloride	0.743	0.390	1.133
Methyl Ethyl Ketone	0.547	0.286	0.833
Methyl Hydrazine	0.238	0.124	0.362
Methyl Methacrylate	0.028	0.014	0.042
Methyl tert Butyl Ether	0.049	0.026	0.075
Naphthalene	1.904	0.020	1.924
Phenol	0.337	0.012	0.349
Polynuclear Aromatic Hydrocarbons	5.318	0.030	5.348
Propionaldehyde	0.533	0.280	0.813
Styrene	0.035	0.018	0.053
Toluene	1.881	0.178	2.059
Vinyl Acetate	0.011	0.006	0.017
Xylene	0.067	0.028	0.095
Total	106.560	6.545	113.105

Non-VOC TAP Speciation

Pollutant	Emissions for Rodemacher Power Station	Emissions for Rodemacher Unit 3	Total Emissions
1,1,1-Trichloroethane	0.072	0.014	0.086
Antimony	1.589	0.026	1.615
Arsenic	15.112	0.604	15.763
Barium	9.062	-	9.106
Beryllium	0.034	0.030	0.065
Cadmium	1.475	0.074	1.548
Chromium VI	0.174	0.116	0.26
Chromium (total)	3.095	-	3.095
Cobalt	1.823	0.146	1.969
Copper	6.960	-	6.962
Cyanide	3.506	1.838	5.344

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Lead	1.135	0.584	1.746
Manganese	10.193	0.724	10.932
Mercury	0.380	0.346	0.727
Methylene Chloride	0.407	0.214	0.621
Nickel	32.334	0.412	32.687
Selenium	4.072	1.912	5.985
Silver	0.108	-	0.108
Total PCDD/PDCDF	<0.001	<0.001	<0.001
Tetrachloroethylene	0.060	0.032	0.092
Thallium	0.981	-	0.981
Vanadium	13.223	-	13.223
Zinc	8.788	-	8.781
Total	111.077	5.234	116.352

Other TAP Speciation

Hydrogen Chloride	1730.790	8.824	1739.614
Hydrogen Fluoride	212.657	1.102	213.374
Sulfuric Acid	420.465	37.650	457.650

Regulatory Analysis

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, and New Source Performance Standards (NSPS). NESHAP and Prevention of Significant Deterioration do not apply.

This facility is a minor source of toxic air pollutants (TAPs) and is exempt from Louisiana (TAPs) regulations pursuant to LAC 33:III.5105.B.2.

The applicability of the appropriate regulations is straightforward and provided in the Acid Rain Permit as well as the Facility Specific Requirements Section of the draft permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the draft permit.

Prevention of Significant Deterioration Applicability

PSD does not apply. No physical changes or changes in the method of operation are being proposed.

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General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

IV. PERMIT SHIELDS

A permit shield was not approved.

V. PERIODIC MONITORING

Unit 1-72 is monitored by a NO_x CEMS, and will have a COMS by the end of 2006.

Unit 1-74 is monitored by a NO_x CEMS, SO₂ CEMS, and a COMS.

Filter vents, cyclone vents and elements will be inspected weekly for visible emissions.

Emission Points 15-96A, 15-96B, 15-96D, 15-96E, 11-96 are subject to NSPS Subpart Y and monitor the opacity using test methods specified in 40 CFR 60.254(b)(1) (Method 5) or (b)(2) (Method 9).

Cleco monitors input sulfur of fuel and calculates sulfur dioxide emissions for Units 1-72 and 1-73

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VII. APPLICABILITY AND EXEMPTIONS OF SELECTED SUBJECT ITEMS

ID No:	Requirement	Notes
	Chapter 22. Control of Emissions of Nitrogen Oxides (NO _x) – Affected Facilities in the Baton Rouge Nonattainment Area and the Region of Influence (LAC 33:III.2201)	Does Not Apply. Facility is not located in the Baton Rouge Nonattainment area or Region of Influence
	Chapter 51. Comprehensive Toxic Air Pollution Emission Control Program Subchapter A. Prohibited Activities and Special Provisions (LAC 33:III.5105.A.2)	Exempt. Facility is exempt from the requirements of Subchapter A per provisions of LAC 33:III.5105.B.2 and 5105.B.3.a. Electric utility steam-generating units are exempt from Chapter 51 in accordance with LAC 33:III.5105.B.2. Emissions from the combustion of Group 1 fossil fuels (natural gas, liquid petroleum gas, distillate fuel oil, gasoline, diesel, and refinery fuel gas) are exempt in accordance with LAC 33:III.5105.B.3.a. Emissions from the combustion of Group 2 fossil fuels (coal, residual fuel oil, and pet coke) vented from a stack that has downwash minimization stack height or a height approved by the LDEQ are exempt in accordance with LAC 33:III.5105.B.3.b.
	Chapter 59. Chemical Accident Prevention and Minimization of Consequences Subchapter B. Risk Management Program Requirements – Registration for Stationary Sources (LAC 33:III.5907)	Does Not Apply. The facility does not produce, process, handle or store any substance listed in 40 CFR 68.130 or Table 59.1 and Table 59.1 of Chapter 59 in an amount greater than the threshold quantity as determined in the manner described in 40 CFR 68.115).

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ID No:	Requirement	Notes
	NESHAP Subpart A General Provisions – (40 CFR 63.1-15)	Does Not Apply. All affected (NESHAP) stationary sources shall comply with applicable provisions of this Subpart. Facility is not subject to MACT standards under 40 CFR part 63 in accordance with the EPA removal of coal-fired and oil-fired electric utility steam generating units from the CAA 112(c) source category list on March 29, 2005.
Facility Wide (Cont.)	Chemical Accident Prevention Provisions (40 CFR Part 68)	Does Not Apply. The facility does not produce, process, handle or store any substance listed in 40 CFR 68.130 in an amount greater than the threshold quantity as determined in the manner described in 40 CFR 68.115.
	Compliance Assurance Monitoring (CAM) (40 CFR 64)	Exempt. 40 CFR 64.5 Deadlines for Submittals allows the facility to submit the Compliance Assurance Monitoring plan at the first renewal of the Part 70 Operating permit
	Subpart D- Standards of Performance Fossil-Fuel fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60.40(c)	Does Not Apply- Per state Permit No. 131, boiler was classified as an existing source as of August 17, 1978.
1-72 Unit 1 Boiler	Subpart Da- Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, 40 CFR 60.40a(2).	Does Not Apply – No construction, modification, or reconstruction after September 18, 1978.

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ID No:	Requirement	Notes
1-72 Unit 1 Boiler (cont.)	NESHAP Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63.7480-63.7575)	Does Not Apply – The regulation applies to a new, reconstructed or existing industrial, commercial, or institutional boiler or process heater that is located at, or is part of, a major source of HAP emissions. Electric utility steam generating units are not subject to Subpart DDDDD. 40 CFR 73.7491(c).
1-73 Package Boiler	Acid Rain Nitrogen Oxides Reduction Program (40 CFR 76.1-76.15)	Does Not Apply. The regulation applies to a coal-fired utility unit subject to the Acid Rain emissions limitations or reduction requirement for SO ₂ under Phase 1 or Phase 2 pursuant to sections 404, 405, or 409 of the Act. Unit is not a coal-fired utility unit.
	Subpart D- Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60.40(a)(1)	Does not Apply. Capacity is less than 259 MMBTU/hr. Date of Construction was March 1, 1974.
	Subpart Db- Standards of Performance for Industrial, Commercial, Institutional Steam Generating Units, 40 CFR 60.40b(a)	Does Not Apply – No construction, modification, or reconstruction after June 19, 1984. Capacity is less than 100 MMBtu/hr.
	NESHAP Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63.7480-63.7575)	Does Not Apply – The regulation applies to a new, reconstructed or existing industrial, commercial, or institutional boiler or process heater that is located at, or is part of, a major source of HAP emissions. Electric utility steam generating units are not subject to Subpart DDDDD. 40 CFR 73.7491(c).

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ID No:	Requirement	Notes
1-73 Package Boiler (cont.)	Acid Rain Nitrogen Oxides Reduction Program (40 CFR 76.1-76.15)	Does Not Apply. The package boiler is not a "utility unit" as defined at 40 CFR 72.2 and is exempt from the Acid Rain Program per 40 CFR 72.6 (b)(8).
	Subpart Da- Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced after September 18, 1978, 40 CFR 60.40 a(a)(2).	Does Not Apply- No construction, modification, or reconstruction after September 18, 1978.
1-74 Unit 2 Boiler	NESHAP Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63.7480-63.7575)	Does Not Apply – The regulation applies to a new, reconstructed or existing industrial, commercial, or institutional boiler or process heater that is located at, or is part of, a major source of HAP emissions. Electric utility steam generating units are not subject to Subpart DDDDD. 40 CFR 73.7491(c).
1-96 Tank 101 2-96 Tank 102 3-96 Tank 103 4-96 Tank 104 5-96 Tank 105 6-96 Tank 106	Storage of Volatile Organic Compounds, LAC 33:III.2103.B NSPS Subpart K- Standards of Performance for Storage Vessels for Petroleum Liquids, 40 CFR 60.110 NSPS Subpart Ka – Standards of Performance for Storage Vessels for Volatile Organic Liquids, 40 CFR 60.110a NSPS Subpart Kb- Standards of Performance for Volatile Organic Liquid Storage Vessels, 40 CFR 60.110b	Does Not Apply- maximum TVP<1.5psia Does Not Apply- No. 6 Fuel oil is not a petroleum liquid per 40 CFR 60.111(b) Does Not Apply- No construction, modification, or reconstruction after May 18, 1978. Does Not Apply- No construction, modification, or reconstruction after July 23, 1984.

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ID No:	Requirement	Notes
07-96 Diesel Tank	Storage of Volatile Organic Compounds, LAC 33:III.2103.A	Does Not Apply - Maximum TVP < 1.5 psia
	NSPS Subpart K- Standards of Performance for Storage Vessels for Petroleum Liquids, 40 CFR 60.110	Does Not Apply- Tank Capacity <40,000 gallons
	NSPS Subpart Ka- Standards of Performance for Storage Vessels for Volatile Organic Liquids, 40 CFR 60.110a	Does Not Apply- Tank Capacity <40,000 gallons
	NSPS Subpart Kb- Standards of Performance for Volatile Organic Liquid Storage Vessels, 40 CFR 60.110b	Does Not Apply- No construction, modification, or reconstruction after July 23, 1984.
08-96 Condensate Drip Tank	Storage of Volatile Organic Compounds, LAC 33:III.2103.A	Exempt per LAC 33:III.2103.G.1
	NSPS Subpart K- Standards of Performance for Storage Vessels for Petroleum Liquids, 40 CFR 60.110	Does Not Apply- Tank Capacity < 40,000 gallons
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Volatile Organic Liquids, 40 CFR 60.110a	Does Not Apply – Tank Capacity <40,000 gallons and no construction, modification, or reconstruction after May 18, 1978.
	NSPS Subpart Kb- Standards of Performance for Volatile Organic Liquid Storage Vessels, 40 CFR 60.110b	Does Not Apply – Tank Capacity <10,000 gallons and no construction, modification, or reconstruction after July 23, 1984.
09-96 Unit 1 Day Tank 10-96 Unit 2 Day Tank	Storage of Volatile Organic Compounds, LAC 33:III.2103.B	Does Not Apply. Maximum TVP <1.5 psia

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ID No:	Requirement	Notes
09-96 Unit 1 Day Tank 10-96 Unit 2 Day Tank (cont.)	NSPS Subpart K- Standards of Performance for Storage Vessels for Petroleum Liquids, 40 CFR 60.110	Does Not Apply. No. 6 Fuel oil is not a petroleum liquid per 40 CFR 60.111(b)
	NSPS Subpart Ka- Standards of Performance for Storage Vessels for Volatile Organic Liquids, 40 CFR 60.110a	Does Not Apply. No construction, modification, or reconstruction after May 18, 1978.
	NSPS Subpart Kb- Standards of Performance of Volatile Organic Liquid Storage Vessels, 40 CFR 60.110b	Does Not Apply. Maximum TVP< 1.5 psia
	Storage of Volatile Organic Compounds, LAC 33:III.2103.B	Does Not Apply. Maximum TVP <1.5 psia.
18-96 and 19-96 Package Boiler Tanks 1 and 2	NSPS Subpart K- Standards of Performance for Storage Vessels for Petroleum Liquids, 40 CFR 60.110	Does Not Apply. No. 2 fuel oil is not a petroleum liquid per 40 CFR 60.111(b)
	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Volatile Organic Liquids, 40 CFR 60.110a	Does Not Apply. No construction, modification, or reconstruction after May 18, 1978.
	NSPS Subpart Kb-Standards of Performance for Volatile Organic Liquid Storage Vessels, 40 CFR 60.110b	Does Not Apply- No construction, modification, or reconstruction after July 23, 1984.

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VII. STREAMLINED REQUIREMENTS

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Rodemacher Power Station	None		

Glossary

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring rule – A federal air regulation under 40 CFR Part 64

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide (H₂S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

NESHAP - National Emission Standards for Hazardous Air Pollutants – Toxic air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

NSPS - New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) – An oxide of sulphur.

TAP - Toxic Air Pollutant (LDEQ acronym for air pollutants regulated under LAC 33 Part III, Chapter 51, Tables 1 through 3

Title V permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.